UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In Re:

KENNETH FULLARD, SR. and

CHARLENE FULLARD, : CHAPTER 13

BANKRUPTCY NO. 16-17011-JKF

DEBTORS.:

:

NOTICE OF MOTION, RESPONSE DATE, AND HEARING DATE

Diamond Resorts U.S. Collection Development, LLC, movant herein has filed a Motion for Relief from the Automatic Stay with the court to permit the enforcement of its *in rem* rights against the personal property commonly known as the timeshare interest 13,500 Points with Initial Use Year, 2017.

<u>Your rights may be affected</u>. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before **March 17, 2017** you or your attorney must do ALL of the following.
 - (a) File an Answer explaining your position at

United States Bankruptcy Court 900 Market Street, Suite 400 Philadelphia, PA 19107 215-408-2800

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the movant's attorney:

Douglas Leavitt, Esquire
Danziger Shapiro & Leavitt, P.C.
150 S Independence Mall West
Suite 1050
Philadelphia, PA 19106
Phone: (215) 545-4830

Fax: (215) 545-6710

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A HEARING ON THE MOTION IS SCHEDULED TO BE HELD BEFORE THE **HONORABLE JEAN FITZSIMON ON MARCH 29, 2017 AT 9:30 AM** IN COURTROOM #3, United States Bankruptcy Court, 900 Market Street, Suite 400, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney names in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: February 28, 2017 /s/ Douglas Leavitt, Esquire

Douglas Leavitt, Esquire
Danziger Shapiro & Leavitt, PC
150 S Independence Mall West
Suite 1050
Philadelphia, PA 19106

Phone: (215) 545-4830 Fax: (215) 545-6710

Attorneys for Diamond Resorts U.S. Collection Development, LLC